STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
75 Davis Street
Providence, R.I. 02908

6 September 198

RCRA RECORDS CENTER
FACILITY Ciba Geigy Corp
I.D. NO. RID001194323
FILE LOC. R-2
OTHER

Dr. James E. Crowley
Ciba-Geigy Corporation
P.O. Box 2055
Providence, RI 02905

Dear Dr. Crowley:

Re: Request for Waiver of Groundwater Monitoring Requirements of Rule 9.03 of the Rules and Regulations for Hazardous Waste Generation, Transportation, Treatment, Storage, and Disposal for the Ciba-Geigy Corporation, 180 Mill Street, Cranston, Rhode Island.

Based upon the documented evidence that any leakage or spillage of hazardous waste to the ground will be minimized to the greatest extent possible at your facility (as referenced above), your waiver request is hereby granted. It is your responsibility to ensure that all aspects of your facility operation prevent the leakage or spillage of hazardous waste to the ground.

This waiver applies to the groundwater monitoring requirements as set forth in Rule 9.03 of the Rules and Regulations for Hazardous Waste Generation, Transportation, Treatment, Storage, and Disposal effective 18 July 1984 and amended September 1984. The director reserves the option to rescind this waiver should information demonstrating the need for groundwater monitoring become available.

Sincerely,

Frank B. Stevenson
Supervising Sanitary Engineer
Division of Air and Hazardous Materials

FBS:jg

Cranston Plant

CIBA-GEIGY Corporation
P.O. Box 2055
Providence, Rhode Island 02905
Telephone 401 467 8200

Shipping Address:
180 Mill Street
Cranston, Rhode Island

CIBA-GEIGY

(17)



August 16, 1984

Mr. Barry W. Muller, Chief
Division of Air and Hazardous Materials
R.I. Department of Environmental Management
75 Davis Street
Providence, Rhode Island 02908

Re: Groundwater Monitoring - Request for Waiver

Dear Mr. Muller:

This is a request for waiver of the groundwater monitoring requirements for Hazardous Waste Storage areas as required by 40 CFR 205.91-94.

CIBA-GEIGY's Hazardous Waste Storage area for drummed material is constructed of asphalt on compacted gravel designed for loads of 3,000 pounds/ft$^2$. A 12" high x 8" wide concrete curb for secondary containment lines the perimeter of the storage area to provide a holding capacity of 18,221 gallons, or approximately 43 percent of the total volume held by the estimated maximum inventory.

The asphalt pad is presently in good condition, free of any gaps, holes or cracks. During normal operating hours the pad is inspected daily by the Environmental Supervisor to ensure that it remains impervious, in good condition and is not being attacked by any incompatible material. On off shifts and weekends, the security guard inspects the area and is instructed to report any abnormalities to the Plant Shift Superintendent. The maximum load with palletized drums stacked three high that can be placed upon the asphalt pad is 600 pounds/ft$^2$. The storage area access is closed with a wooden barrier board with a flexible seal on the bottom of the board which is held in place with vertical angle iron tracks on each end. A weather-tight enclosure is located adjacent to the storage area in which are stored sandbags to be used to seal the opening in the event of a leak or spill from any of the drums. The drums are stored on six inch high pallets which prevents the drums from coming in direct contact with any normally accumulated liquids. Rainwater which accumulates in the storage area is inspected for evidence of contamination prior to being released from the area by removing the wooden barrier board. If there is any contamination, the liquid is removed by application of the plant Standard Operating Procedure for Spill Control - Hazardous Waste Management Areas. A six-feet-high, chain-link fence with two lockable gates is installed to ensure safety and security.

The 6,000 gallon capacity tank (T-1) provides primary containment for wastes generated from the processing facility. The tank was fabricated in 1962 in accordance with Underwriters Laboratories specifications for storage tanks for flammable, chemical materials. The tank is 8'-0" diameter, 17'-0" straight vertical side with flat bottom and dished top. The tank had a 0.313" design thickness. The total thickness, as measured in July 1983, indicates a range of 0.280" to 0.310". The tank is constructed of standard SA283 grade C carbon steel with a tensile strength of 55,000 psi. The tank is located in a 19' x 14' - 6" x 4' high diked area for secondary containment and is supported on a concrete foundation which consists of a one foot thick concrete reinforced slab containing two rows of top and bottom 5/8" diameter reinforcing rods located 8" on centers in both directions. A one foot thick concrete octagonal pad is positioned on top of the reinforced slab to elevate the tank bottom above the dike floor. The concrete foundation is designed for loads of 3000#/ft$^2$. The full tank exerts a load upon the support foundation of 1460#/ft$^2$. The tank is equipped with both a 3" normal Protectoseal mode 863B flame arrester vent and 12" emergency Protectoseal model 7812 pressure relief vent. The emergency pressure relief vent is designed to relieve a one ounce/in$^2$ of pressure.

Procedures are in place and personnel have been trained in the containment and cleaning up of spills. Personnel who load and unload hazardous waste have also been trained in procedures for containing any spillage.

The construction of the Hazardous Waste Storage areas, the procedures for Spill Control and the training of personnel provide that any leakage of hazardous waste to the ground will be mimimized to the greatest extent possible.

Sincerely,

James E. Crowley, Manager
Safety, Health and Environment

JEC/ml